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FILED 06 FEB 22 13:07 USDC-OR

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

DANIEL SALGADO,

Case No. 06-3010-CO

Plaintiff,

v.

Complaint for Violations of Fair Debt
Collection Practices Act and Fair Credit
Reporting Act

PAUL LAW OFFICES; and WELLS
FARGO BANK, NATIONAL
ASSOCIATION,

Defendants.

JURY REQUESTED

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual damages, statutory damages, punitive damages, and attorney fees and costs brought by Plaintiff, Daniel Salgado, an individual consumer, against Defendants, Paul Law Offices and Wells Fargo Bank, National Association, for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq* (herein "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices, and for violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq*. ("FCRA"), which prohibits furnishers of information from engaging in abusive, deceptive, and unfair practices.

II. JURISDICTION

2. This Court has jurisdiction pursuant to the FDCPA, 15 U.S.C. § 1692k(d) and 28 U.S.C. § 1337, and pursuant to the FCRA, 15 U.S.C. § 1681. Venue in this District is proper because Defendants conduct business in Oregon and the conduct complained of occurred within the District.

III. PARTIES

3. Plaintiff is a natural person residing in Central Point, Oregon.

4. Defendant Paul Law Offices, (herein "Paul"), is an Utah law firm engaged in the business of collecting debts with its principal place of business located in Salt Lake City, Utah. The principal purpose of Defendant Paul is the collection of debts and Defendant Paul regularly attempts to collect debts alleged to be due another.

5. Defendant Paul is not licensed to do business in the state of Oregon, is not licensed to practice law in the state of Oregon and is not licensed to collect debts in the state of Oregon.

6. Defendant Paul is engaged in the collection of debts from consumers using the telephone. Defendant Paul regularly attempt to collect consumer debts alleged to be due to another. Defendant Paul is a "debt collector" as defined by the FDCPA, 15 U.S.C. § 1692a(6).

7. Defendant Wells Fargo Bank, National Association, (herein "Wells Fargo"), is a national bank chartered under the laws of the United States.

8. Plaintiff is a "consumer" as defined by the FDCPA, 15 U.S.C. § 1692a(3) and by the FCRA, § 1681 a(c).

IV. FACTUAL ALLEGATIONS

9. Plaintiff has never had, nor currently owes a debt to Defendant Wells Fargo.

10. Plaintiff has informed Defendant Paul that he does not, nor did he ever have an account with Defendant Wells Fargo.

11. Plaintiff has informed Defendant Paul that the debt in question does not belong to him.

12. Defendant Paul willfully requested and received Plaintiff's Experian consumer credit report on November 9, 2004 knowing that Plaintiff did not owe Defendants any money. (Exhibit A.)

13. Defendant Paul has threatened to pursue legal action against Plaintiff if Plaintiff does not remedy the debt in question. (Exhibit B.)

V. CLAIM FOR RELIEF

**Claim One
(FDCPA)**

14. Defendant Paul's action in continuing to attempt to collect the debt in question from Plaintiff after Plaintiff informed Defendant Paul that he does not have, nor has ever had an account with Defendant Wells Fargo is a violation of the FDCPA, 15 U.S.C. §§ 1692c, 1692d.

15. Defendant Paul's action has caused Plaintiff damages in the form of embarrassment, emotional distress, and attorney fees.

**Claim Two
(FDCPA)**

16. Defendant Paul's action in threatening to pursue legal action against Plaintiff if Plaintiff does not remedy the debt in question is a violation of the FDCPA, 15 U.S.C. § 1692e.

17. Defendant Paul's action has caused Plaintiff damages in the form of embarrassment, emotional distress, and attorney fees.

**Claim Three
(FCRA)**

18. Defendant Paul's action in requesting and viewing Plaintiff's Experian credit report is a willful violation of the FCRA, 15 U.S.C. § 1681q.

19. Defendant Paul's action has caused Plaintiff damages in the form of embarrassment, emotional distress, damaged credit scoring, and attorney fees.

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**Claim Four
(FCRA)**

20. Defendant Wells Fargo is liable for the actions of Defendant Paul.

21. Wells Fargo's action in employing Paul who reviewed Plaintiff's Experian credit report is a violation of the FCRA, 15 U.S.C. § 1681q, Defendant Wells Fargo's action has caused Plaintiff damages in the form of embarrassment, emotional distress, damaged credit scoring, and attorney fees.

WHEREFORE, Plaintiff Daniel Salgado respectfully requests that judgment be entered against Defendants as follows:

- A. Declaratory Judgment that Defendant Paul's actions violated the FDCPA;
- B. Declaratory Judgment that Defendants' actions violated the FCRA;
- C. Actual Damages;
- D. Statutory Damages pursuant to 15 U.S.C. § 1692k in the amount of \$1,000.00;
- E. Statutory Damages pursuant to 15 U.S.C. § 1681n in the amount of \$1,000.00;
- F. Punitive Damages;
- G. Costs and reasonable attorney's fees pursuant to 15 U.S.C. § 1692k and 15 U.S.C. § 1681n; and
- H. For such other relief that the Court may deem just and proper.


DATED February 20, 2006



Keith D. Karnes OSB # 03352
Attorney for Plaintiff

DEMAND FOR JURY TRIAL

Please take notice that Plaintiff requests a trial by jury in this matter.



Keith D. Karnes, OSB # 03352
Attorney for Plaintiff



X Close

Online Personal Credit Report from Experian for

Experian credit report prepared for
DANIEL SALGADO
Your report number is
3476291915
Report date:
02/07/2006

Index:

- Accounts in good standing
- Requests for your credit history
- Personal information
- Important message from Experian
- Contact us
- Know your rights



Experian collects and organizes information about you and your credit history from public records, your creditors and other reliable sources. Experian makes your credit history available to your current and prospective creditors, employers and others as allowed by law, which can expedite your ability to obtain credit and can make offers of credit available to you. We do not grant or deny credit; the credit grantor makes that decision based on its own guidelines.

Accounts in Good Standing

ba

AMEX

Address: Account Number:
PO BOX 297812 015998170013347942
FT LAUDERDALE, FL 33329
(800) 528-2122
Status: Paid,Closed/Never late.

Date Opened:	Type:	Credit Limit/Original Amount:
08/1989	Revolving	NA
Reported Since:	Terms:	High Balance:
11/2001	1 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
11/2001	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
11/2001	Individual	NA

Your statement:
Account closed at consumer's request

ASSOC FINANCIAL SVCS

Address: Account Number:
259 E BARNETT RD STE J 2365895031....
MEDFORD, OR 97501
No phone number available
Status: Paid,Closed/Never late.

Date Opened:	Type:	Credit Limit/Original Amount:
09/1994	Mortgage	\$168,917
Reported Since:	Terms:	High Balance:
09/1994	60 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
05/1997	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
05/1997	Joint	NA

EXHIBIT **A**
PAGE **1** OF **17**

BANK OF AMERICA

Address: Account Number:
PO BOX 1598 488860311989....
NORFOLK, VA 23501
(800) 444-8430
Status: Open/Never late.

Date Opened:	Type:	Credit Limit/Original Amount:
12/2004	Revolving	\$5,500
Reported Since:	Terms:	High Balance:
12/2004	NA	\$5,539
Date of Status:	Monthly Payment:	Recent Balance:
01/2006	\$108	\$5,123 as of 01/2006
Last Reported:	Responsibility:	Recent Payment:
01/2006	Individual	\$110

Balance History:

12/2005 \$5,175
11/2005 \$5,356
10/2005 \$5,344
09/2005 \$5,330
08/2005 \$5,188
07/2005 \$5,238
06/2005 \$5,288
05/2005 \$5,388
04/2005 \$5,499
03/2005 \$5,534
02/2005 \$5,490
01/2005 \$5,500
12/2004 \$0

Between Dec 2004 and Dec 2005, your credit limit/high balance was \$5,500

CAP ONE BK

Address: Account Number:
PO BOX 85015 438864185089....
RICHMOND, VA 23285
(800) 903-3637
Status: Paid,Closed/Never late.

Date Opened:	Type:	Credit Limit/Original Amount:
01/2001	Revolving	NA
Reported Since:	Terms:	High Balance:
01/2001	NA	\$215
Date of Status:	Monthly Payment:	Recent Balance:
08/2002	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
08/2002	Individual	NA

Your statement:
Account closed at consumer's request

CBUSASEARS

EXHIBIT

PAGE 2 OF 17

Address:
PO BOX 6189
SIOUX FALLS, SD 57117
No phone number available
Status: Open/Never late.

Account Number:
504994800388....

Date Opened:	Type:	Credit Limit/Original Amount:
07/1973	Revolving	\$2,600
Reported Since:	Terms:	High Balance:
05/1994	NA	\$2,122
Date of Status:	Monthly Payment:	Recent Balance:
01/2006	\$61	\$1,967 as of 01/2006
Last Reported:	Responsibility:	Recent Payment:
01/2006	Individual	\$0

Balance History:

12/2005 \$1,956
11/2005 \$1,967
10/2005 \$2,060
09/2005 \$2,099
08/2005 \$1,780
07/2005 \$1,794
06/2005 \$1,190
05/2005 \$1,167
04/2005 \$1,173
03/2005 \$1,116
02/2005 \$1,252
01/2005 \$992
12/2004 \$949
11/2004 \$804
09/2004 \$611
08/2004 \$599
07/2004 \$589
06/2004 \$628
05/2004 \$303
04/2004 \$169
03/2004 \$352
02/2004 \$66

Between Jul 2004 and Dec 2005, your credit limit/high balance was \$2,600
Between Feb 2004 and Jun 2004, your credit limit/high balance was \$2,150

CHASE

Address:
800 BROOKSEGE BLVD
WESTERVILLE, OH 43081
(800) 955-9900
Status: Open/Never late.

Account Number:
435787686006....

Date Opened:	Type:	Credit Limit/Original Amount:
05/2005	Revolving	\$8,000
Reported Since:	Terms:	High Balance:
06/2005	NA	\$7,776
Date of Status:	Monthly Payment:	Recent Balance:
01/2006	\$144	\$7,241 as of 01/2006
Last Reported:	Responsibility:	Recent Payment:
01/2006	Individual	\$147

EXHIBIT A
PAGE 3 OF 17

Balance History:

12/2005 \$7,388
11/2005 \$7,538
10/2005 \$7,691
09/2005 \$3,701
08/2005 \$3,075
07/2005 \$0
06/2005 \$0

Between Jun 2005 and Dec 2005, your credit limit/high balance was \$8,000

CHASE

Address:
800 BROOKSEdge BLVD
WESTERVILLE, OH 43081
(800) 955-9900
Status: Open/Never late.

Account Number:
426684106630....

Date Opened:	Type:	Credit Limit/Original Amount:
10/2005	Revolving	\$8,000
Reported Since:	Terms:	High Balance:
11/2005	NA	\$6,980
Date of Status:	Monthly Payment:	Recent Balance:
01/2006	\$139	\$6,972 as of 01/2006
Last Reported:	Responsibility:	Recent Payment:
01/2006	Individual	\$94

Balance History:

12/2005 \$4,710
11/2005 \$4,771

Between Nov 2005 and Dec 2005, your credit limit/high balance was \$8,000

CHASE

Address:
PO BOX 901008
FORT WORTH, TX 76101
(800) 800-5626
Status: Paid,Closed/Never late.

Account Number:
42925854....

Date Opened:	Type:	Credit Limit/Original Amount:
05/2005	Revolving	\$43,500
Reported Since:	Terms:	High Balance:
05/2005	NA	\$43,902
Date of Status:	Monthly Payment:	Recent Balance:
12/2005	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
12/2005	Individual	NA

Balance History:

12/2005 \$0
10/2005 \$43,902
09/2005 \$43,877
08/2005 \$43,380
07/2005 \$43,366
06/2005 \$40,808

EXHIBIT A
PAGE 4 OF 17

05/2005 \$33,154

Between Sep 2005 and Dec 2005, your credit limit/high balance was \$43,500

Between Jul 2005 and Aug 2005, your credit limit/high balance was \$42,977

Between Jun 2005 and Jun 2005, your credit limit/high balance was \$40,494

Between May 2005 and May 2005, your credit limit/high balance was \$33,000

CHASE MANHATTAN MTGE

Address:
PO BOX 24696
COLUMBUS, OH 43224
(800) 314-5662
Status: Paid,Closed/Never late.

Account Number:
139704....

Date Opened:	Type:	Credit Limit/Original Amount:
04/2005	Mortgage	\$172,500
Reported Since:	Terms:	High Balance:
07/2005	30 Years	NA
Date of Status:	Monthly Payment:	Recent Balance:
11/2005	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
11/2005	Individual	NA

CHASE MANHATTAN MTGE

Address:
PO BOX 24696
COLUMBUS, OH 43224
(800) 314-5662
Status: Open/Never late.

Account Number:
139704....

Date Opened:	Type:	Credit Limit/Original Amount:
10/2005	Mortgage	\$232,000
Reported Since:	Terms:	High Balance:
01/2006	30 Years	NA
Date of Status:	Monthly Payment:	Recent Balance:
01/2006	\$1,063	\$231,926 as of 01/2006
Last Reported:	Responsibility:	Recent Payment:
01/2006	Individual	\$1,063

CHEVRON CREDIT BANK NA

Address:
PO BOX 5010
CONCORD, CA 94524
(800) 243-8766
Status: Closed/Never late.

Account Number:
708005....

Date Opened:	Type:	Credit Limit/Original Amount:
05/1990	Revolving	NA
Reported Since:	Terms:	High Balance:
04/1994	NA	\$936

EXHIBIT A
PAGE 5 OF 17

Date of Status:	Monthly Payment:	Recent Balance:
05/1999	\$0	\$0 /paid as of 05/1999
Last Reported:	Responsibility:	Recent Payment:
05/1999	Joint	\$0

Your statement:
Account closed at consumer's request

CITIFINANCIAL

Address:	Account Number:
110 LINCOLN HWY	607372331211....
FAIRLESS HILLS, PA 19030	
<i>No phone number available</i>	
Status: Paid,Closed/Never late.	

Date Opened:	Type:	Credit Limit/Original Amount:
01/2002	Installment	\$2,079
Reported Since:	Terms:	High Balance:
01/2002	12 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
02/2002	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
02/2002	Individual	NA

CITIFINANCIAL

Address:	Account Number:
110 LINCOLN HWY	607372333514....
FAIRLESS HILLS, PA 19030	
<i>No phone number available</i>	
Status: Open/Never late.	

Date Opened:	Type:	Credit Limit/Original Amount:
09/2005	Installment	\$9,568
Reported Since:	Terms:	High Balance:
09/2005	60 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
12/2005	\$267	\$9,214 as of 12/2005
Last Reported:	Responsibility:	Recent Payment:
12/2005	Individual	\$300

GOTTSCHALKS

Address:	Account Number:
PO BOX 28920	10018....
FRESNO, CA 93729	
<i>No phone number available</i>	
Status: Inactive/Never late.	

Date Opened:	Type:	Credit Limit/Original Amount:
02/1992	Revolving	NA
Reported Since:	Terms:	High Balance:
04/1994	NA	\$108
Date of Status:	Monthly Payment:	Recent Balance:
04/1994	\$0	\$0 /paid as of 04/1996

EXHIBIT A
PAGE 6 OF 17

Last Reported: 04/1996 Responsibility: Joint with JUDI E SOUZA Recent Payment: \$0

T/EMPORIUM

Address: PO BOX 5467
EUGENE, OR 97405
No phone number available
Status: Closed/Never late.

Account Number: 0704332....

Date Opened:	Type:	Credit Limit/Original Amount:
09/1989	Revolving	\$3,000
Reported Since:	Terms:	High Balance:
04/1994	NA	\$907
Date of Status:	Monthly Payment:	Recent Balance:
10/2000	\$0	\$0 as of 05/2002
Last Reported:	Responsibility:	Recent Payment:
05/2002	Joint with JUDI E SOUZA	\$0

Your statement:
Account closed at consumer's request

Requests for Your Credit History

b2

Requests Viewed By Others

We make your credit history available to your current and prospective creditors and employers as allowed by law. Personal data you may be made available to companies whose products and services may interest you.

The section below lists all who have requested in the recent past to review your credit history as a result of actions involving you, such as the completion of a credit application or the transfer of an account to a collection agency, application for insurance, mortgage application, etc. Creditors may view these requests when evaluating your creditworthiness.

FISERV CREDSTAR

Address:
6350 LAUREL CANYON BLVD
NORTH HOLLYWOOD CA 91606
No phone number available

Date of Request:
01/11/2006

Comments:
Real estate loan on behalf of QUICKEN
LOANS INC. This inquiry is scheduled to
continue on record until Feb 2008.

1 SOURCE DATA/SECURED FU

Address:
2335 CAMINO VIDA ROBLE
CARLSBAD CA 92011
No phone number available

Date of Request:
12/28/2005

Comments:
Real estate loan . This inquiry is scheduled
to continue on record until Jan 2008.

CHASE

EXHIBIT A
PAGE 7 OF 17

Address:
6465 S GREENWOOD PLZ BLV
CENTENNIAL CO 80111
No phone number available
Comments:
Real estate loan . This inquiry is scheduled
to continue on record until Jan 2008.

Date of Request:
12/08/2005

DISCOVER FINANCIAL SERVI

Address:
2500 LAKE COOK RD # 2N
RIVERWOODS IL 60015
No phone number available
Comments:
Permissible purpose. This inquiry is
scheduled to continue on record until Dec
2007.

Date of Request:
11/10/2005

CHASE

Address:
194 WOOD AVE S
ISELIN NJ 08830
(800) 877-3115
Comments:
Real estate loan . This inquiry is scheduled
to continue on record until Nov 2007.

Date of Request:
10/13/2005

CREDIT PLUS

Address:
31550 WINTERPLACE PKWY
SALISBURY MD 21804
No phone number available
Comments:
Real estate loan on behalf of NEW DAY
FINANCIAL LLC FG. This inquiry is
scheduled to continue on record until Nov
2007.

Date of Request:
10/13/2005

FIRST USA,NA

Address:
800 BROOKS EDGE BLVD
WESTERVILLE OH 43081
No phone number available
Comments:
Permissible purpose. This inquiry is
scheduled to continue on record until Nov
2007.

Date of Request:
10/12/2005

CHASE

Address:
194 WOOD AVE S
ISELIN NJ 08830
(800) 877-3115
Comments:
Real estate loan . This inquiry is scheduled
to continue on record until Oct 2007.

Date of Request:
09/08/2005

LANDSAFECREDIT

Address:

Date of Request:

EXHIBIT A
PAGE 8 OF 17

1515 WALNUT GROVE AVE
ROSEMEAD CA 91770

08/22/2005

No phone number available

Comments:

Real estate loan on behalf of BENCHMARK LENDING GROUP . This inquiry is scheduled to continue on record until Sep 2007.

CHASE

Address:

194 WOOD AVE S
ISELIN NJ 08830
(800) 877-3115

Date of Request:
03/23/2005

Comments:

Real estate loan . This inquiry is scheduled to continue on record until Apr 2007.

ADP/DOLLAR OLDS GMC

Address:

325 S RIVERSIDE AVE
MEDFORD OR 97501

Date of Request:
03/17/2005

No phone number available

Comments:

Auto loan. This inquiry is scheduled to continue on record until Apr 2007.

ADP/DOLLAR OLDS GMC

Address:

325 S RIVERSIDE AVE
MEDFORD OR 97501

Date of Request:
03/08/2005

No phone number available

Comments:

Auto loan. This inquiry is scheduled to continue on record until Apr 2007.

FIRST AMERICAN CREDCO

Address:

12395 FIRST AMERICAN WAY
POWAY CA 92064

Date of Request:
03/08/2005

No phone number available

Comments:

Real estate loan on behalf of ACCREDITED HOME LENDERS-. This inquiry is scheduled to continue on record until Apr 2007.

EQUIFAX MORTG SERVICES

Address:

6 CLEMENTON RD E STE A2
GIBBSBORO NJ 08026

Date of Request:
02/08/2005

No phone number available

Comments:

Conventional mortgage on behalf of ROGUE FEDERAL CREDIT U. This inquiry is scheduled to continue on record until Mar 2007.

CREDCO

Address:

Date of Request:

EXHIBIT A
PAGE 9 OF 17

12395 FIRST AMERICAN WAY
POWAY CA 92064

01/12/2005

No phone number available

Comments:

Real estate loan on behalf of LONG BEACH
MORTGAGE. This inquiry is scheduled to
continue on record until Feb 2007.

FIRST AMERICAN CREDCO

Address:

1500 NW BETHANY BLVD STE
BEAVERTON OR 97006

Date of Request:
12/29/2004

No phone number available

Comments:

Real estate loan on behalf of WAMU -
00875. This inquiry is scheduled to continue
on record until Jan 2007.

WASHINGTON MUTUAL MORTGA

Address:

188 106TH AVE NE STE 520
BELLEVUE WA 98004

Date of Request:
12/29/2004

No phone number available

Comments:

Permissible purpose. This inquiry is
scheduled to continue on record until Jan
2007.

LANDAMERICA CREDIT SVCS

Address:

23622 CALABASAS RD STE 1
CALABASAS CA 91302

Date of Request:
11/29/2004

No phone number available

Comments:

Real estate loan . This inquiry is scheduled
to continue on record until Dec 2006.

PAUL LAW OFFICES

Address:

230 W 200 S STE 3301
SALT LAKE CITY UT 84101

Date of Request:
11/09/2004

No phone number available

Comments:

Collection purpose. This inquiry is scheduled
to continue on record until Dec 2006.

ADP/AIRPORT CHEVROLET

Address:

3001 BIDDLE RD
MEDFORD OR 97504

Date of Request:
06/01/2004

No phone number available

Comments:

Auto loan. This inquiry is scheduled to
continue on record until Jul 2006.

ROGUE FEDERAL CR UNION

Address:

1085 ROYAL CT
MEDFORD OR 97504

Date of Request:
06/01/2004

EXHIBIT A
PAGE 10 OF 17

No phone number available

Comments:

Residential rental. This inquiry is scheduled to continue on record until Jul 2006.

WFS FINANCIAL

Address:

23 PASTEUR
IRVINE CA 92618

No phone number available

Comments:

Permissible purpose. This inquiry is scheduled to continue on record until Jun 2006.

Date of Request:

05/31/2004

Requests Viewed Only By You

The section below lists all who have a permissible purpose by law and have requested in the recent past to review your information. You may not have initiated these requests, so you may not recognize each source. We offer information about you to those with a permissible purpose, for example, to:

- other creditors who want to offer you preapproved credit;
- an employer who wishes to extend an offer of employment;
- a potential investor in assessing the risk of a current obligation;
- Experian or other credit reporting agencies to process a report for you;
- your existing creditors to monitor your credit activity (date listed may reflect only the most recent request).

We report these requests **only to you** as a record of activities. We **do not** provide this information to other creditors who evaluate your creditworthiness.

EXPERIAN

Address:

PO BOX 9600
ALLEN TX 75013

No phone number available

Date of Request:

02/06/2006

FAC/HM LOAN CNTR LENDING

Address:

163 TECHNOLOGY DR
IRVINE CA 92618

No phone number available

Date of Request:

01/12/2006, 12/29/2005,
12/09/2005, 10/14/2005,
08/23/2005

WACHOVIA BBANK OF DE/FTU

Address:

1525 W WT HARRIS BLVD
CHARLOTTE NC 28262

No phone number available

Date of Request:

12/29/2005

CHASE

Address:

800 BROOKSEDGE BLVD
WESTERVILLE OH 43081

No phone number available

Date of Request:

12/09/2005

SECURED FUNDING CORP

Address:

18012 COWAN ST
IRVINE CA 92614

No phone number available

Date of Request:

12/09/2005

EXHIBIT A
PAGE 11 OF 17

VIKING CREDIT CORPORATIO

Address:
2955 RED HILL AVE
COSTA MESA CA 92626
No phone number available

Date of Request:
12/09/2005

FAC/CREDITREPORT.COM

Address:
9040 TOPANGA CANYON BLVD
CANOGA PARK CA 91304
No phone number available

Date of Request:
11/29/2005

FAC/MIGHTY NET

Address:
12395 FIRST AMERICAN WAY
POWAY CA 92064
No phone number available

Date of Request:
11/29/2005

METROPOLITAN HOME MORTGA

Address:
4 PARK PLZ STE 800
IRVINE CA 92614
No phone number available

Date of Request:
11/28/2005

CHASE BANK

Address:
100 DUFFY AVE # 4H2
HICKSVILLE NY 11801
No phone number available

Date of Request:
11/11/2005

STEARNS LENDING INC

Address:
4 HUTTON CENTRE DR STE 5
SANTA ANA CA 92707
No phone number available

Date of Request:
11/09/2005

HOME LOAN FUNDING

Address:
2501 ALTON PKWY
IRVINE CA 92606
No phone number available

Date of Request:
11/01/2005

CHASE BANK

Address:
100 DUFFY AVE # 4H2
HICKSVILLE NY 11801
No phone number available

Date of Request:
10/14/2005

DISCOVER FINANCIAL SVCS

Address:
PO BOX 15157
WILMINGTON DE 19886
No phone number available

Date of Request:
10/14/2005, 09/15/2005,
08/17/2005, 08/12/2005,
08/05/2005, 07/22/2005

FIRST USA,NA

Address:
PO BOX 8650
WILMINGTON DE 19899
(800) 955-9900

Date of Request:
09/22/2005

CHASE BANK USA,NA

Address:
3415 VISION DR
COLUMBUS OH 43219

Date of Request:
08/23/2005

EXHIBIT A
PAGE 12 OF 17

(800) 848-9136

FIRST USA,NA

Address:
PO BOX 8650
WILMINGTON DE 19899
(800) 955-9900

Date of Request:
08/22/2005

FHLMC FREDDIE MAC

Address:
8200 JOANS BRANCH DR
MCLEAN VA 22102
No phone number available

Date of Request:
06/30/2005

CITI

Address:
PO BOX 6000
SIOUX FALLS SD 57117
No phone number available

Date of Request:
04/15/2005

OCEAN BANK FSB

Address:
1 HOME LOAN PLZ
WARWICK RI 02886
No phone number available

Date of Request:
03/11/2005

INTERTHINX

Address:
5230 LAS VIRGENES RD STE
CALABASAS CA 91302
No phone number available

Date of Request:
03/08/2005

Comments:

On behalf of CENDANT MORTGAGE for 30

INTERTHINX

Address:
5230 LAS VIRGENES RD STE
CALABASAS CA 91302
No phone number available
On behalf of CENDANT MORTGAGE for 30

Date of Request:
03/08/2005

CIC/EXPERIAN CREDIT RPT

Address:
PO BOX 19729
IRVINE CA 92623
No phone number available

Date of Request:
03/05/2005

MERCHANTS CR GUIDE CO

Address:
223 W JACKSON BLVD
CHICAGO IL 60606
No phone number available

Date of Request:
02/25/2005, 02/24/2005,
10/29/2004

CAPITAL ONE BANK

Address:
4851 COX RD
GLEN ALLEN VA 23060
No phone number available

Date of Request:
02/24/2005, 11/28/2004,
06/23/2004

CAPITAL ONE BANK

Address:

Date of Request:
06/23/2004

EXHIBIT A
PAGE 13 OF 17

No phone number available

MUTUAL OF OMAHA INSURANC

Address:
MUTUAL OF OMAHA PLAZA
OMAHA NE 68175
No phone number available

Date of Request:
06/03/2004

CREDIT EXPERT

Address:
PO BOX 19729
IRVINE CA 92623
No phone number available

Date of Request:
05/21/2004

EXPERIAN

Address:
520 E MAIN ST
CARNEGIE PA 15106
No phone number available

Date of Request:
11/06/2001

Personal Information

b2

The following information is reported to us by you, your creditors and other sources. Each source may report your personal information differently, which may result in variations of your name, address, Social Security number, etc. As part of our fraud-prevention notice with additional information may appear. As a security precaution, the Social Security number that you used to obtain is not displayed. The Geographical Code shown with each address identifies the state, county, census tract, block group and Metropolitan Statistical Area associated with each address.

Names:

DANIEL P SALGADO
DANIEL SALGADO
DANIEL P SALGODO
DAN DESOUSA
DANIEL SALGADO Sr.
DANIEL P SALGADO Sr.
DANIEL DESOUSA Sr.
DANIEL P DESOUSA Sr.
DANIEL SOUSA

Address: 683 FARNSWORTH DR
CENTRAL POINT, OR 97502-1977
Type of Residence: Single family
Geographical Code: 0-90020-29-4890

Address: PO BOX 3633
CENTRAL POINT, OR 97502-0025
Type of Residence: Post office box
Geographical Code: 0-100010-29-

Address: 693 FARNSWORTH DR
CENTRAL POINT, OR 97502-1977
Type of Residence: Single family
Geographical Code: 0-90020-29-4890

Date of birth:
07/23/1945

Spouse's First Name:
DEBORAH

Address: 109 VINCENT AVE
CENTRAL POINT, OR 97502-1572
Type of Residence: Single family
Geographical Code: 0-90020-29-

Employers:
SBC ENGINEERING
SALGATO ENTERPRISES
SELF

Important Message From Experian

b2

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e., "Cancer Center") that reports your payment history to us. If so, those names display in your report, but in reports to others they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

EXHIBIT

A

PAGE

14 OF 17

Contacting Us

b6

NCAC
P.O. Box 9556
Allen, TX 75013
800 493 1058
M - F 9am - 5pm in your time zone.

Know your rights

b6

FCRA Rights

Para informacion en espanol, visite www.ftc.gov/credit o escriba a la FTC Consumer Response Center, Room 130-A 601 Pennsylvania Ave. N.W., Washington, D.C. 20580.

A Summary of Your Rights under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. **For more information, including information about additional rights, go to www.ftc.gov/credit or write to: Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.**

- **You must be told if information in your file has been used against you.** Anyone who uses a credit report or another consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address, and phone number of the agency that provided the information.
- **You have the right to know what is in your file.** You may request and obtain all the information about you in the files of a consumer reporting agency (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
 - a person has taken adverse action against you because of information in your credit report;
 - you are the victim of identity theft and place a fraud alert in your file;
 - your file contains inaccurate information as a result of fraud;
 - you are on public assistance;
 - you are unemployed but expect to apply for employment within 60 days.

In addition, by September 2005 all consumers will be entitled to one free disclosure every 12 months upon request from a nationwide credit bureau and from nationwide specialty consumer reporting agencies. See www.ftc.gov/credit for additional information.

- **You have the right to ask for a credit score.** Credit scores are numerical summaries of your credit-worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you may receive credit score information for free from the mortgage lender.
- **You have the right to dispute incomplete or inaccurate information.** If you identify information in your file that is incomplete or inaccurate, and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. For more information, go to www.ftc.gov/credit for an explanation of dispute procedures.
- **Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.** Inaccurate, incomplete, or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.
- **Consumer reporting agencies may not report outdated negative information.** In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.
- **Access to your file is limited.** A consumer reporting agency may provide information about you only to people with a valid need – usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifically prohibits access to your file by those with a valid need for access.

EXHIBIT

PAGE 15 OF 17

- **You must give your consent for reports to be provided to employers.** A consumer reporting agency may not give you information about you to your employer, or a potential employer, without your written consent given to the employer. Your consent generally is not required in the trucking industry. For more information, go to www.ftc.gov/credit.
- **You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.** Unsolicited "prescreened" offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureau at 1 888 5OPTOUT (1 888 567 8688).
- **You may seek damages from violators.** If a consumer reporting agency, or, in some cases, a user of consumer reporting information, furnishes information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.
- **Identify theft victims and active duty military personnel have additional rights.** For more information, visit www.ftc.gov/credit.

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. Federal enforcers are:

Type of Business:	Contact:
Consumer reporting agencies, creditors and others not listed below	Federal Trade Commission: Consumer Response Center - FCRA Washington, DC 20580 1 877 382 4357
National banks, federal branches/agencies of foreign banks (word "National" or initials "N.A." appear in or after bank's name)	Office of the Comptroller of the Currency Compliance Management, Mail Stop 6-6 Washington, DC 20219 1 800 613 6743
Federal Reserve System member banks (except national banks, and federal branches/agencies of foreign banks)	Federal Reserve Board Division of Consumer & Community Affairs Washington, DC 20551 1 202 452 3693
Savings associations and federally chartered savings banks (word "Federal" or initials "F.S.B." appear in federal institution's name)	Office of Thrift Supervision Consumer Complaints Washington, DC 20552 1 800 842 6929
Federal credit unions (words "Federal Credit Union" appear in institution's name)	National Credit Union Administration 1775 Duke Street Alexandria, VA 22314 1 703 519 4600
State-chartered banks that are not members of the Federal Reserve System	Federal Deposit Insurance Corporation Consumer Response Center 2345 Grand Avenue, Suite 100 Kansas City, Missouri 64108-2638 1 877 275 3342
Air, surface, or rail common carriers regulated by former Civil Aeronautics Board or Interstate Commerce Commission	Department of Transportation Office of Financial Management Washington, DC 20590 1 202 366 1306
Activities subject to the Packers and Stockyards Act, 1921	Department of Agriculture Office of Deputy Administrator - GIPSA Washington, DC 20250 1 202 720 7051

States Rights

Notification of rights for California consumers
 California notice of your rights to request and obtain your credit score
 Notification of rights for Colorado consumers
 Notification of rights for Connecticut consumers
 Notification of rights for Maryland consumers
 Notification of rights for Massachusetts consumers

EXHIBIT A
 PAGE 16 OF 17

Notification of rights for Nevada consumers
Notification of rights for North Carolina consumers
Notification of rights for Texas consumers
Notification of rights for Vermont consumers
Notification of rights for Washington consumers

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EXHIBIT A
PAGE 17 OF 17

Paul Law Offices
A Professional Limited Liability Company
Attorneys at Law

August 1, 2005

PO Box 3536
Salt Lake City, Utah 84110
Telephone: (801) 466-2130
Facsimile: (801) 466-2059
Toll Free: 1-866-507-5050

SOUSA, DANIEL
683 FARNSWORTH DR
CENTRAL POINT OR 97502

RE: WELLS FARGO
ACCT#: 5282313171350650
CASE#: 152136-C14

Daniel Sousa,

We have made several attempts to voluntarily resolve your obligation with this firm to no avail. This office is reviewing your account for legal action. If appropriate, we will proceed against you. If a court awards us a judgment against you there will be an additional assessment of costs and attorney fees, and post-judgment remedies may be taken.

Due to lack of resolution on your part we assessed your property at 683 FARNSWORTH DR CENTRAL POINT OR 97502. We confirmed this through the County Accessors Office.

Your loan is currently \$18,056.87 (with interest).

We have investigated your account and our assessment is complete. If you do not respond within (7) days from the date of this letter, we will proceed accordingly. Your action will govern ours.

Respectfully,

Quintin Severnak
Legal Assistant
PAUL LAW OFFICES, LLC

This is an attempt to collect a debt voluntarily and any information obtained will be used for that purpose.

EXHIBIT

B

PAGE

1 OF 2

PAUL LAW OFFICES, PLLC

230 West 200 South #3301

PO Box 3536

Salt Lake City, UT 84110

Telephone 801-466-2130

Fax 801-466-2059

December 5, 2005

Re: WELLS FARGO

Acct #: 5282313171350650

Case File 152136

Obligation Amount: \$18,390.65

Interest Accrued: \$8,721.49

Daniel Sousa

683 FARNSWORTH DR

CENTRAL POINT OR 97502

Daniel Sousa,

We have made attempts to voluntarily resolve your obligation with this firm to no avail. This office is reviewing your account for legal action, and if appropriate, we will proceed against you. If the court awards us judgment against you, there will be additional costs assessed to you, such as attorney and court costs. Post-judgment remedies may be taken.

Due to the lack of response, we have initiated an investigation of assets, property, bank account, vehicle and/or employment. This satisfies our internal requirements for pre litigation. A decision is being rendered at this time based on the information obtained.

We are willing to accept a settlement, in full, for the amount of **\$6000.00**. The settlement amount must be paid no later than December 15, 2005, by means of check-by-phone, certified funds, credit card or Western Union.

We must have a response within 10 days of the date on this letter. Understand we are prepared to make a decision on this matter in the absence of your response. However, we would like you to be a part of the decision making process, your actions will govern ours.

Regards,



Karrie Eubank
Paul Law Offices

pl/as

This is an attempt to collect a debt and any information obtained will be used for that purpose.

EXHIBIT

B

PAGE

2

OF

2